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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.,
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA, and
BRUCE MAPLEY SR.,

Defendants,

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.,
Cross Claimant,

BRUCE MAPLEY, SR.,
Cross Defendant.

Case No. CV-20-52-BLG-SPW

**PLAINTIFFS' NOTICE OF
WRITTEN DISCOVERY AND
ASSOCIATED CONFERRAL
EFFORTS**

In advance of the April 13, 2021 status conference in the above referenced matters, Plaintiffs provide NOTICE of the parties' written discovery activities and their several attempts to resolve disputes regarding the same:

1. Discovery Served on Watch Tower Bible and Tract Society of Pennsylvania ("WTPA").

- a. Plaintiffs served their first set of written discovery on Defendant WTPA on October 14, 2020.
- b. Plaintiffs served a second set of discovery on WTPA on November 17, 2020.
- c. Based on the answers and responses to the first two sets of written discovery, Plaintiffs then served a third set of written discovery on WTPA on January 25, 2021.
- d. With each set of discovery served, Plaintiffs granted WTPA an unconditional extension to answer and respond, totaling thirty-one (31) days of extensions.
- e. Upon reviewing WTPA's answers and responses to each set of discovery, Plaintiffs sent correspondence to WTPA outlining Plaintiffs' concerns with WTPA's answers and responses.

- f. After trading four sets of written correspondence and holding a telephone conference call on March 29, 2021, disputes over WTPA's answers and responses remain unresolved.

2. Discovery Served on Watchtower Bible and Tract Society of New York, Inc. ("WTNY").

- a. Plaintiffs served their first set of written discovery on Defendant WTNY on November 17, 2020.
- b. Based on the answers and responses to the first set of written discovery, Plaintiffs then served a second set of written discovery on WTNY on January 25, 2021.
- c. With each set of discovery served, Plaintiffs granted WTNY an unconditional extension to answer and respond, totaling twenty-four (24) days of formal extensions.
- d. Upon reviewing WTNY's answers and responses to each set of discovery, Plaintiffs sent correspondence to WTNY outlining Plaintiffs' concerns with WTNY's answers and responses.
- e. After sending three sets of written correspondence and holding a telephone conference call on March 29, 2021, disputes over WTNY's answers and responses remain unresolved.

**3. Subpoena Served on Hardin Congregation of Jehovah's Witnesses
("Hardin Congregation").**

- a. On December 28, 2020, Plaintiffs were notified that attorney Kevin Funyak represents the Hardin Congregation.
- b. On January 7, 2021, Plaintiffs received notice that Mr. Funyak was authorized to receive and accept a subpoena duces tecum on behalf of the Hardin Congregation.
- c. On January 11, 2021 Plaintiffs mailed and emailed a copy of the Subpoena Duces Tecum and an accompanying Waiver of Service form to Mr. Funyak for the purpose of completing service of process of the Subpoena Duces Tecum on the Hardin Congregation.
- d. On February 11, 2021 Plaintiffs received documents and a privilege log in response to the Subpoena Duces Tecum served on the Hardin Congregation.
- e. On March 30, 2021 Plaintiffs sent correspondence to Mr. Funyak regarding concerns with the Hardin Congregation's privilege log.
- f. To date, Mr. Funyak has acknowledged receipt of Plaintiffs' March 30, 2021 letter but he has not responded to the substance of the concerns raised therein and disputes over the Hardin Congregation's assertion of privileges remain unresolved.

DATED this 9th day of April, 2021.

By: /s/ Ryan Shaffer

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Attorneys for Plaintiffs